



Oregon

Kate Brown, Governor

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Northwest Region

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April 27, 2016

via electronic mail

Colin Polk
Portland Development Commission
222 NW 5th Avenue
Portland, OR 97209

Re: Transformer Room Assessment
Centennial Mills Site
ECSI # 5136

Colin:

DEQ Northwest Region Cleanup Section staff completed review of the ***Transformer Room Assessment, Centennial Mills (ECSI #5136)*** prepared by Hart Crowser on the behalf of the Portland Development Commission and dated April 22, 2016. The letter report documents removal of 10 electrical transformers and four switch gear boxes from the Warehouse E portion of the site, where (partial) demolition activities are ongoing. Following removal, the electrical equipment was accepted by PGE for disposal. Work was completed in 2015. The Transformer Room is located in the western portion of the Centennial Mills building complex, well away from the Willamette River.

As noted in the report, wipe sampling for PCBs was completed in association with removal of the equipment, and included both the transformer room and a drainpipe from the room that ultimately connects to Outfall WR-336. The outfall discharges to the Willamette River below the historical mill complex. Wipe sampling following EPA protocols, and samples were analyzed using the EPA 8082A analytical method.

PCBs were detected in Transformer Room floor samples, the pipe outlet in the room, and in a segment of pipe below the room to 2.47 ug/ 100 cm². PCBs were not detected in a wipe sample collected at the WR-336 outfall. (<0.200 ug/ 100 cm²). All detections are below EPA's cleanup criterion of 10 ug/100 cm² for high contact residential/commercial surfaces in non-restricted access areas. These data supplement sampling results from previous investigation of the Transformer Room and pipe completed in 1999 and 2003. Oils from two switch gear reservoirs located in the Flour Mill main floor electrical room were also analyzed for PCBs during the 2015 work; none were detected.

DEQ's 2014 source control decision for the Centennial Mills site acknowledged the presence of PCB-bearing electrical equipment in Warehouse E, and the results of 1999 and 2003 sampling. The SCE also considered data from Willamette River sediment sampling adjacent to Centennial

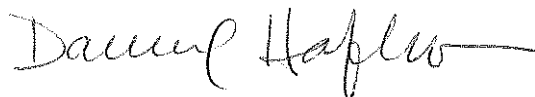
Mills and Outfall WR-336 in concluding that the site was not, and is not expected to be, a significant source of PCBs to the river.

Investigation results associated with removal of the transformers and switch gear in 2015 confirm DEQ's conclusions that the Centennial Mills complex is not a significant source of PCBs to the Willamette River. Furthermore, with removal of transformer equipment, any potential for future releases from this area via stormwater has been eliminated.

If future abandonment activities at the site including demolition of the Transformer Room and related piping, materials should be managed in such a manner as to prevent environmental releases, and PCB-contaminated demolition debris should be disposed of at a Subtitle D landfill. We understand that the pipe connection between the Transformer Room and Outfall WR-336 has been severed (and cut ends capped).

I can be reached at (503) 229-5417 if you have questions or comments about the information presented in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Hafley", followed by a horizontal line.

Daniel Hafley, RG
Senior Project Manager/Hydrogeologist

Cc: Alex Liverman, DEQ
Eva DeMaria, EPA
Rick Ernst, Hart Crowser